

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**Objection Deadline: Oct. 3, 2023, at 4:00 p.m. (ET)**

**SUMMARY COVER SHEET OF FIRST MONTHLY APPLICATION OF  
WHITE & CASE LLP FOR ALLOWANCE OF COMPENSATION AND  
REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM  
JUNE 27, 20223 TO AND INCLUDING JULY 31, 2023**

Name of Applicant:	White & Case LLP
Authorized to Provide Professional Services to:	Debtors and Debtors-in-Possession
Date of Retention:	Effective June 27, 2023
Period for Which Compensation and Reimbursement Are Requested:	June 27, 2023 – July 31, 2023
Total Amount of Compensation (100%):	\$2,296,617.00
Amount of Compensation Requested (80%):	\$1,837,293.60
Amount of Compensation Held Back (20%):	\$459,323.40
Amount of Expense Reimbursement Requested:	\$4,880.64
Aggregate Amount to be Paid Under Compensation Procedures Order:	\$1,842,174.24

This is a monthly fee application.

<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors' service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

**MONTHLY FEE APPLICATIONS FILED**

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
		<b>Requested</b>		<b>Approved On Monthly Basis</b>		<b>Holdback</b>		<b>Total Approved By Interim Order</b>	
<b>Date; D.I.</b>	<b>Period Covered</b>	<b>Fees</b>	<b>Expenses</b>	<b>Fees</b>	<b>Expenses</b>	<b>Fees</b>	<b>Expenses</b>	<b>Fees</b>	<b>Expenses</b>
N/A									

**SUMMARY OF TOTAL FEES AND HOURS  
BY ATTORNEYS AND PARAPROFESSIONALS**

Name	Title	Year Admitted	Areas of Expertise	Hours	Rate	Fees
Cieply, Adam	Partner	2010	M&A - Corporate Practice	15.0	\$26,280.00	\$21,900.00
Garr, Laura	Partner	2010	Commercial Litigation Practice	17.3	\$8,220.00	\$23,701.00
Gorsich, Ronald	Partner	2001	Financial Restructuring & Insolvency (FRI) Practice	49.1	\$17,810.00	\$67,267.00
Green, Jesse	Counsel	2007	Commercial Litigation Practice	100.2	\$57,640.00	\$131,262.00
He, Fan	Counsel	2007	Financial Restructuring & Insolvency (FRI) Practice	169.7	\$162,440.00	\$222,307.00
Hirshorn, Deanna	Legal Assistant	N/A	Financial Restructuring & Insolvency (FRI) Practice	17.0	\$10,260.00	\$6,460.00
Kampfner, Roberto	Partner	1995	Financial Restructuring & Insolvency (FRI) Practice	108.8	\$119,250.00	\$172,992.00
Kaul, Sequoia	Associate	2018	Commercial Litigation Practice	142.0	\$37,100.00	\$150,520.00
Kim, David	Associate	2021	Financial Restructuring & Insolvency (FRI) Practice	32.5	\$8,640.00	\$31,200.00
Kim, Doah	Associate	2012	Financial Restructuring & Insolvency (FRI) Practice	187.3	\$179,070.00	\$237,871.00
Kropp, Andrea	Associate	2021	Financial Restructuring & Insolvency (FRI) Practice	26.5	\$14,280.00	\$27,030.00
Lauria, Thomas	Partner	1987	Financial Restructuring & Insolvency (FRI) Practice	20.5	\$44,100.00	\$43,050.00
Ludovici, Stephen	Associate	2014	Financial Restructuring & Insolvency (FRI) Practice	33.4	\$48,360.00	\$41,416.00
Mezei, Livy	Associate	2017	Financial Restructuring & Insolvency (FRI) Practice	90.9	\$40,800.00	\$92,718.00
Padmanabhan, Aditi	Associate	2023	Pool Associates - Litigation	89.4	\$17,020.00	\$66,156.00
Pryor, Gregory	Partner	1989	M&A - Corporate Practice	25.1	\$29,250.00	\$48,945.00
Saunders, Coleman	Associate	2021	Commercial Litigation Practice	12.9	\$3,840.00	\$12,384.00
Smith, Erin	Associate	2014	Commercial Litigation Practice	34.6	\$27,940.00	\$43,942.00
Strom, Peter	Associate	2021	Financial Restructuring & Insolvency (FRI) Practice	65.8	\$30,720.00	\$63,168.00
Szuba, RJ	Associate	2017	Financial Restructuring & Insolvency (FRI) Practice	152.2	\$114,000.00	\$173,508.00
Turetsky, David	Partner	2003	Financial Restructuring & Insolvency (FRI) Practice	202.1	\$400,750.00	\$353,675.00
Zakia, Jason	Partner	1999	Commercial Litigation Practice	125.9	\$82,250.00	\$220,325.00
Zhang, Shirley	Associate	2022	M&A - Private Equity Practice	54.0	\$19,090.00	\$44,820.00
<b>Grand Total</b>				<b>1,772.2</b>		<b>\$2,296,617.00</b>

**STATEMENT OF FEES AND HOURS BY PROJECT CATEGORY**

<b>Cat. No.</b>	<b>Project Category Description</b>	<b>Total Hours</b>	<b>Total Fees</b>
B01	Asset Analysis, Sale & Disposition	298.1	\$384,821.00
B02	Automatic Stay Issues	179.2	\$201,607.00
B03	Avoidance Actions & Other Asset Recovery	0.0	\$0.00
B04	Business Operations, Vendor & Utility Issues	19.9	\$27,506.00
B05	Case Administration	42.0	\$40,333.00
B06	Case Strategy	48.4	\$71,401.00
B07	Claims Administration & Objections	113.1	\$156,687.00
B08	Corporate Advice & Board Meetings	33.9	\$55,006.00
B09	Creditor Meetings & Statutory Committees	84.4	\$107,050.00
B10	Disbursement	0.0	\$0.00
B11	Discovery	0.0	\$0.00
B12	Exclusivity, Plan & Disclosure Statement	12.7	\$16,689.00
B13	Executory Contracts & Unexpired Leases	36.7	\$46,772.00
B14	First Day Pleadings	173.2	\$227,243.00
B15	Hearings & Court Matters	105.2	\$151,445.00
B16	Insurance Issues	45.8	\$56,377.00
B17	Litigation	301.0	\$391,267.00
B18	Nonworking Travel	0.0	\$0.00
B19	Professional Retention & Fees – W&C	20.3	\$28,354.00
B20	Professional Retention & Fees – Other	85.5	\$102,486.00
B21	Reports, Schedules & U.S. Trustee Issues	118.6	\$156,511.00
B22	Tax Issues	3.4	\$5,659.00
B23	Employee Issues	50.8	\$69,403.00
	<b>Grand Total</b>	<b>1,772.2</b>	<b>\$2,296,617.00</b>

**EXPENSE SUMMARY**

Description	Bill Amount
Airfare	\$1,010.80
Conference Room Dining	\$193.53
Document Research	\$37.62
Hotel Expense	\$2,825.94
Overtime Meals	\$219.98
Taxi - Business	\$344.86
Taxi - Overtime	\$188.91
Travel Meals	\$59.00
<b>Grand Total</b>	<b>\$4,880.64</b>

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**Objection Deadline: Oct. 3, 2023, at 4:00 p.m. (ET)**

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**FIRST MONTHLY APPLICATION OF WHITE & CASE LLP FOR  
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES  
FOR THE PERIOD JUNE 27, 2023 TO AND INCLUDING JULY 31, 2023**

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White & Case LLP (“**White & Case**”), counsel for the debtors and the debtors in possession (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases, hereby files this first monthly application (this “**Application**”) for the period from June 27, 2023 to and including July 31, 2023 (the “**Compensation Period**”) requesting (a) interim allowance and payment of compensation for professional services to the Debtor in the amount of \$1,842,174.24, representing 80% of the \$2,296,617.00 of fees earned by White & Case for professional services to the Debtors during the Compensation Period, and (b) reimbursement of 100% of the actual and necessary expenses incurred by White & Case during the Compensation Period in connection with such services in the amount of \$4,880.64. In support of this Application, White & Case respectfully represents as follows:

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<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

### **JURISDICTION, VENUE AND PREDICATES FOR RELIEF**

1. This Court has jurisdiction to consider this Application under 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference*, dated February 29, 2012 (Sleet, C.J.). This is a core proceeding under 28 U.S.C. § 157(b). Venue of the Chapter 11 Cases and this Application is proper in this District under 28 U.S.C. §§ 1408 and 1409.

2. The predicates for the relief requested by this Application are sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “**Bankruptcy Code**”), rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals and Committee Members* [Docket No. 181] (the “**Compensation Procedures Order**”).

### **BACKGROUND**

3. On June 27, 2023 (the “**Petition Date**”), the Debtors each commenced with this Court a voluntary case under chapter 11 of the Bankruptcy Code (collectively, the “**Chapter 11 Cases**”). The Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b). The Debtors continue to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. On July 11, 2023, the Office of the United States Trustee for the District of Delaware (the “**U.S. Trustee**”) appointed the official committee of unsecured creditors (the “**Creditors’ Committee**”) for these Chapter 11 Cases. On September 7, 2023, the U.S. Trustee appointed the official committee of equity security holders (the “**Equity Committee**” and

collectively with the Creditors' Committee, the "**Committees**") for these Chapter 11 Cases. No trustee or examiner has been appointed in these Chapter 11 Cases.

4. The Court has authorized the Debtors to retain and employ White & Case as their lead bankruptcy counsel, effective as of the Petition Date, pursuant to the *Order Authorizing the Employment and Retention of White & Case LLP as Attorneys to the Debtors Effective as of the Petition Date* [Docket No. 175] (the "**Retention Order**"). The Retention Order authorizes the Debtors to compensate and reimburse White & Case in accordance with the terms and conditions set forth in the Debtors' application to retain White & Case, subject to White & Case's application to the Court.

5. On July 25, 2023, the Court entered the Compensation Procedures Order, which provides, among other things, that each chapter 11 professional seeking interim compensation in the Chapter 11 Cases may file an application (a "**Monthly Fee Application**") for interim approval and allowance of compensation for services rendered and reimbursement of expenses incurred during the immediately preceding month and serve a copy of such Monthly Fee Application on the Notice Parties (as defined in the Compensation Procedures Order). Then, each Notice Party will have until 4:00 p.m. (prevailing Eastern Time) on the twentieth (20th) day after service of a Monthly Fee Application to object thereto (the "**Objection Deadline**"). Upon expiration of the Objection Deadline, the professional may file a certificate of no objection consistent with Local Rule 9013-1(j) with the Court after which the Debtors are authorized to pay each professional an amount equal to the lesser of: (i) 80 percent (80%) of the fees and 100 percent (100%) of the expenses requested in the Monthly Fee Application; and (ii) 80 percent (80%) of the fees and 100 percent (100%) of the expenses not subject to an objection.



**RELIEF REQUESTED**

6. By this Application, in accordance with the Compensation Procedures Order, White & Case requests payment in the aggregate amount of \$1,842,174.24, which is equal to (a) 80% of the \$2,296,617.00 of fees earned by White & Case for professional services to the Debtors during the Compensation Period; and (b) 100% of the \$4,880.64 of actual and necessary expenses incurred by White & Case during the Compensation Period in connection with its services to the Debtors.

**SUMMARY OF SERVICES RENDERED**

7. Prior to filing this Application, White & Case reviewed its fees worked (which totaled 2,104.5 hours and \$2,644,898.00) and expenses incurred (which totaled \$5,204.65). Following that review, White & Case voluntarily elected to reduce its fees by 332.3 hours and \$348,281.00 (~13.2%) and its expenses by \$324.01 (~6.2%) prior to filing this Application. White & Case will not hereafter seek payment for the fees and expenses that it has voluntarily reduced.

8. Attached hereto as **Exhibit A** is a detailed statement of White & Case's hours expended and fees earned during the Compensation Period. A summary of White & Case's hours expended and fees earned during the Compensation Period grouped by category (discussed below) are in the summary cover sheets prefixed to this Application. The attorneys and paraprofessionals who provided services to the Debtors during the Compensation Period are also identified in **Exhibit A** and in the summary cover sheets. The services rendered by White & Case during the Compensation Period are grouped into the categories set forth in **Exhibit A** and in the summary cover sheets prefixed to this Application. The following is a brief narrative summary of the

services performed by White & Case professionals and paraprofessionals on behalf of the Debtors during the Compensation Period, organized by category:

No.	Category Name
	Brief Narrative Summary
<b>B01</b>	<b>Asset Analysis, Sale &amp; Disposition</b>
	During the Compensation Period, White & Case advised the Debtors on numerous issues related to the Debtors' marketing and sale process with respect to their assets, as well as other matters. Among other things, White & Case advised the Debtors with respect to legal matters relating to the Debtors' interactions with potential bidders, the marketing and potential sale of their assets, and the prosecution of the Debtors' bid procedures motion. The latter included advising the Debtors in responding to Karma's objection to the bid procedures motion. As a result of White & Case's efforts, the Debtors obtained approval of their proposed bidding procedures following two contested hearings and were able to launch the marketing and sale process with respect to their assets.
<b>B02</b>	<b>Automatic Stay Issues</b>
	During the Compensation Period, White & Case advised the Debtors on numerous issues related to enforcement of the automatic stay, including objecting to Karma's motion to lift the automatic stay.
<b>B03</b>	<b>Avoidance Actions &amp; Other Asset Recovery</b>
	During the Compensation Period, White & Case billed no time to this project category.
<b>B04</b>	<b>Business Operations, Vendor &amp; Utility Issues</b>
	During the Compensation Period, White & Case advised the Debtors with respect to various matters related to the Debtors' remaining operations, including with respect to issues concerning vendors. The efforts have permitted the Debtors to address various issues, including with respect to their critical vendors.
<b>B05</b>	<b>Case Administration</b>
	During the Compensation Period, White & Case professionals and paraprofessionals were in various activities related to the management of these Chapter 11 Cases, including preparing and updating a case calendar, maintaining an FTP site for documents and diligence, and tracking and monitoring work in progress.
<b>B06</b>	<b>Case Strategy</b>
	During the Compensation Period, White & Case professionals advised the Debtors with respect to legal matters concerning strategy with respect to the Chapter 11 Cases. Among other things, White & Case team members participated twice-weekly calls team calls with the Debtors and their other professionals and in daily internal meetings to address open

	issues and case strategy. These initiatives have allowed the Debtors and their professionals to remain coordinated and to advance the Debtors' strategy and objectives in the Chapter 11 Cases
<b>B07</b>	<b>Claims Administration &amp; Objections</b>
	During the Compensation Period, White & Case attorneys advised the Debtors with respect to various matters concerning claims and the claims administration process, including drafting the motion to establish the bar date in these Chapter 11 Cases (which was filed shortly after the Compensation Period) and drafting and prosecuting the motion to estimate Karma's claim (as well as the reply in support of same).
<b>B08</b>	<b>Corporate Advice &amp; Board Meetings</b>
	During the Compensation Period, White & Case professionals advised the Debtors with respect to certain corporate and board matters, including advising the Debtors at Board meetings and preparing materials in connection with such meetings. White & Case professionals also drafted and revised the presentations for such calls and meetings. These efforts have, among other things, assisted the Debtors' board of directors in remaining properly informed of the events of these Chapter 11 Cases and thereby in discharging their fiduciary duties.
<b>B09</b>	<b>Creditor Meetings &amp; Statutory Committees</b>
	During the Compensation Period, White & Case responded to various inquiries, requests for information, and issues raised by the Creditors' Committee regarding the Debtors and the Chapter 11 Cases. White & Case professionals also participated on numerous calls with the Creditors' Committee's professionals regarding the Debtors' first day orders, second day relief, and pending litigation, including the actions involving Foxconn and Karma. These efforts assisted the Creditors' Committee's professionals in getting up to speed so that they could quickly advise their clients.
<b>B10</b>	<b>Disbursement</b>
	During the Compensation Period, White & Case billed no time to this project category.
<b>B11</b>	<b>Discovery</b>
	During the Compensation Period, White & Case billed no time to this project category.
<b>B12</b>	<b>Exclusivity, Plan &amp; Disclosure Statement</b>
	During the Compensation Period, White & Case worked on initial drafts of the Debtors' chapter 11 plan and disclosure statement.
<b>B13</b>	<b>Executory Contracts &amp; Unexpired Leases</b>
	During the Compensation Period, White & Case advised the Debtors on issues related to the Debtors' executory contracts and unexpired leases. For example, White & Case

	professionals reviewed and analyzed certain license, real estate lease agreements, and other contracts and agreements, in connection with issues relating to the Chapter 11 Cases.
<b>B14</b>	<b>First Day Pleadings</b>
	During the Compensation Period, White & Case drafted, revised, and prosecuted twelve procedural and operational first day motions and related pleadings, on an interim and final basis. White & Case professionals worked extensively with the Debtors' management to finalize such first day motions and resolve any formal or informal issues by revising certain first day orders. White & Case also worked extensively to prosecute the Debtors' requests for final relief with respect to their first day motions and prepared additional declarations and other documents, as necessary, in support of the Debtors' such relief. As a result of White & Case's efforts, the Debtors successfully obtained interim and final orders on the Debtors' initial motions in the Chapter 11 Cases.
<b>B15</b>	<b>Hearings &amp; Court Matters</b>
	During the Compensation Period, White & Case prepared for and represented the Debtors in the first day hearing on June 28, 2023 and the contested hearing on July 27, 2023.
<b>B16</b>	<b>Insurance Issues</b>
	During the Compensation Period, White & Case reviewed and advised the Debtors in connection with insurance policies and related matters involving the Debtors' insurance.
<b>B17</b>	<b>Litigation</b>
	During the Compensation Period, White & Case advised the Debtors regarding various pending litigation matters, including Foxconn's motion to dismiss or convert the Chapter 11 Cases, the Debtors' motion to extend the automatic stay to the Delaware securities litigation, chapter 11 matters relating to the securities class actions against the Debtors (as well as efforts to resolve them), certain matters relating to the Debtors' disputes with Karma, as well as discovery matters.
<b>B18</b>	<b>Nonworking Travel</b>
	During the Compensation Period, White & Case billed no time to this project category.
<b>B19</b>	<b>Professional Retention &amp; Fees – W&amp;C</b>
	During the Compensation Period, White & Case prepared the Debtors' application for employment of White & Case as the Debtors' counsel, which was approved by the Court.
<b>B20</b>	<b>Professional Retention &amp; Fees – Other</b>
	During the Compensation Period, White & Case prepared and/or advised the Debtors in connection with applications for employment of Silverman Consulting as financial advisor, Jefferies LLC as investment banker, Kurtzman Carson Consultants LLC as claims and noticing agent and administrative advisor, Baker Hostetler LLP as special corporate counsel, and KPMG LLP as auditor. White & Case also prepared and advised the Debtors

	with respect to the motion to retain and pay professionals utilized in the ordinary course of the Debtors' business and the motion for order establishing interim compensation and reimbursement of expenses for chapter 11 professionals and Committee members in the Chapter 11 Cases.
<b>B21</b>	<b>Reports, Schedules &amp; U.S. Trustee Issues</b>
	During the Compensation Period, White & Case prepared and prosecuted the Debtors' motion to extend the deadline to file their schedules and statements of financial affairs. White & Case professionals also worked with the Debtors, Silverman Consulting and other professionals to prepare and file (as applicable) the Debtors' schedules and statements of financial affairs, monthly operating report for June, and prepare for the 341(a) meeting of creditors. White & Case professionals also worked with the U.S. Trustee to address and resolve certain comments the U.S. Trustee had with respect to the Debtors' first- and second-day motions and orders. In addition, White & Case coordinated with Baker Hostetler regarding the necessary corporate filings with the U.S. Securities and Exchange Commission. These efforts assisted the Debtors in responding to the U.S. Trustee's information inquiries and in complying with the reporting and other requirements associated with operating in chapter 11.
<b>B22</b>	<b>Tax Issues</b>
	During the Compensation Period, White & Case analyzed the tax considerations of the Debtors' motion for interim and final orders establishing notice and hearing procedures for trading equity securities in the Debtors. In connection therewith, White & Case professionals reviewed related tax and finance documents and conferred with other professionals including KPMG. White & Case's efforts assisted the Debtors in obtaining approval of a trading order to preserve the Debtors' net operating losses and other potentially valuable tax attributed.
<b>B23</b>	<b>Employee Issues</b>
	White & Case advised the Debtors on various employee-related issues, severance, wage issues, and matters relating to the Debtors' employee wages motion.

9. White & Case attorneys and paraprofessionals billed a total of 1,772.2 hours in connection with these Chapter 11 Cases during the Compensation Period. All services rendered by White & Case for which compensation is sought pursuant to this Application were rendered solely to or on behalf of the Debtors. No payments were received by White & Case from any other source for services rendered or to be rendered in connection with these Chapter 11 Cases.

**ACTUAL AND NECESSARY EXPENSES**

10. Attached as **Exhibit B** is a detailed statement of White & Case's out-of-pocket expenses incurred during the Compensation Period, totaling \$4,880.64. These expenses include, but are not limited to, airfare, hotels, and taxis.

**VALUATION OF SERVICES**

11. As noted above, the amount of time spent by each White & Case attorney and paraprofessional providing services to the Debtors during the Compensation Period is set forth in the summary cover sheets hereto. The rates reflected thereon are White & Case's customary hourly rates for work of this character. The reasonable value of the services rendered by White & Case for which White & Case seeks compensation for the Compensation Period as attorneys to the Debtors in these Chapter 11 Cases is \$2,296,617.00. The blended rate for compensation requested in this Application is approximately \$1,296.<sup>2</sup>

12. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the fees requested are fair and reasonable given (a) the complexity of these Chapter 11 Cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under this title.

13. Although White & Case has made every effort to include all fees earned and expenses incurred during the Compensation Period, some fees and expenses might not be included in this Application due to delays caused by accounting and processing during the Compensation Period. White & Case reserves the right to make further applications to this Court for allowance of such fees and expenses not included herein. Subsequent fee applications will be filed in

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<sup>2</sup> The blended rate is calculated by taking the total of fees included in this Monthly Fee Application and dividing by the total of hours included in this Monthly Fee Application, rounded to the nearest dollar.

accordance with the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and the Compensation Procedures Order.

**CERTIFICATION OF COMPLIANCE**

14. The undersigned has reviewed the requirements of Local Rule 2016-2 and certifies that, to the best of his knowledge, information, and belief, this Application complies with the requirements of that Local Rule.

WHEREFORE, White & Case requests allowance and payment of the aggregate amount of \$1,842,174.24, which is equal to (a) 80% of the \$2,296,617.00 of fees earned by White & Case for professional services to the Debtors during the Compensation Period; and (b) 100% of the \$4,880.64 of actual and necessary expenses incurred by White & Case during the Compensation Period in connection with its services to the Debtors.

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Dated: September 13, 2023

Respectfully submitted,

/s/David M. Turetsky

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**WHITE & CASE LLP**

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